

**PART 70 MINOR SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES
MANAGEMENT DIVISION**

**Reilly Industries, Inc.
1500 South Tibbs Avenue
Indianapolis, Indiana 46242**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15, IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Source Modification No.:T097-11345-00315	
Issued by: Robert F. Holm, PH.D, Administrator Indianapolis Environmental Resources Management Division	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONSTRUCTION CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Effective Date of the Permit [IC13-15-5-3]
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

C GENERAL OPERATION CONDITIONS

- C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
- C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
- C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- C.4 Opacity [326 IAC 5-1]
- C.5 Operation of Equipment [326 IAC 2-7-6(6)]
- C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]
- C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.8 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
- C.9 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

D.1 FACILITY OPERATION CONDITIONS - Storage Tank T641

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

Record Keeping and Reporting [326 IAC 2-7-5(3)][326 IAC 2-7-19]

- D.1.2 Record Keeping Requirement

Certification

SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Indianapolis Environmental Resources Management Division (ERMD). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a Synthetic Organic Chemical Manufacturing Facility.

Responsible Official:	John P. Rodgers
Source Address:	1500 South Tibbs Avenue, Indianapolis Indiana 46242
Mailing Address:	1500 South Tibbs Avenue, Indianapolis Indiana 46242
Phone Number:	(317)-247-8141
SIC Code:	2899 and 2869
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to reconstruct and operate the following emission units and pollution control devices:

- (a) Tank 614 is a fixed roof dome tank with a maximum storage capacity of 371 cubic meters (98,000 gallons) storing volatile organic liquids with a maximum true vapor pressure ranging from 1.4 to 5.3 pounds per square inch. The maximum throughput capacity of this tank is 1,000,000 gallons per year from chemical process equipment.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification ~~[326 IAC 2-7-4(f)]~~~~[326 IAC 2-7-6(1)]~~~~[326 IAC 2-7-5(3)(C)]~~

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan ~~[326 IAC 2-7-5(1),(3) and (13)]~~ ~~[326 IAC 2-7-6(1) and (6)]~~ ~~[326 IAC 1-6-3]~~

- (a) If required by specific condition in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. IDEM, OAM, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, and ERMD, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.8 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, and ERMD within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and ERMD within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and ERMD reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM and ERMD that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.9 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (c) Unless otherwise specified in this approval, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) Tank 614 is a fixed roof dome tank with a maximum storage capacity of 371 cubic meters (98,000 gallons) storing volatile organic liquids with a maximum true vapor pressure ranging from 1.4 to 5.3 pounds per square inch. The maximum throughput capacity of this tank is 1,000,000 gallons per year from chemical process equipment.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart G.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.2 Record Keeping Requirements

Pursuant to 40 CFR 63.123(a) the Permittee is required to keep the records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel as long as the storage vessel holds the Group 1 or Group 2 status.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Reilly Industries, Inc.
Source Address: 1500 South Tibbs Avenue, Indianapolis Indiana 46242
Mailing Address: 1500 South Tibbs Avenue, Indianapolis Indiana 46242
Source Modification No.: 097-11345-00315

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental Resources Management Division
Air Quality Management Section**

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification.**

Source Background and Description

Source Name:	Reilly Industries, Inc.
Source Location:	1500 South Tibbs Avenue, Indianapolis Indiana 46242
County:	Marion
SIC Code:	2899
Operation Permit No.:	T097-7552-00315
Operation Permit Issuance Date:	Pending
Minor Source Modification No.:	T097-11345-00315
Permit Reviewer:	Patrick Coughlin

The Office of Air Management (OAM) and Indianapolis Environmental Resources Management Division (ERMD) has reviewed a modification application from Reilly Industries, Inc. relating to the reconstruction of the following emission units and pollution control devices:

- (a) Tank 614 is a fixed roof dome tank with a maximum storage capacity of 371 cubic meters (98,000 gallons) storing volatile organic liquids with a maximum true vapor pressure ranging from 1.4 to 5.3 pounds per square inch. The maximum throughput capacity of this tank is 1,000,000 gallons per year from chemical process equipment.

History

On September 8, 1999, Reilly Industries Inc. submitted an application to the ERMD and OAM requesting to approval for a reconstruction to Tank 614. Reilly Industries Inc. has submitted a complete Part 70 application on December 12, 1996.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
T641	Tank 641	45	0.5	NA	Ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 8, 1999.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. The emissions calculation data was classified a confidential and is not included in this document.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0
PM-10	0
SO ₂	0
VOC	1.6
CO	0
NO _x	0

HAP's	Potential To Emit (tons/year)
Acetaldehyde	0.24
Acetonitrile	0.08
Benzene	0.06
Methanol	0.002
TOTAL	<1

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(6)

County Attainment Status

The source is located in Marion County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM-10, CO, SO₂, NO₂ and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Greater than 100, less than 250
PM-10	Less than 100
SO ₂	Greater than 250
VOC	Greater than 250
CO	Greater than 250
NO _x	Greater than 250

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories.
- (b) These emissions are based upon Aerometric Information Retrieval System Data.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Emissions (Tons/Year)					
	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Tank 641	0	0	1.6	0	0	<1
PSD Significance Thresholds	15	40	40	100	40	NA
Major PSD Modification:	No	No	No	No	No	NA

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) Tank 641 is subject to the requirements of 40 CFR Part 63 Subpart G. Pursuant to the definitions in 63.111, storage vessels are classified as follows:
- (1) *Group 1 storage vessel* means a storage vessel that can meet the criteria for design capacity and stored-liquid maximum true vapor pressure specified in Table 5 of this subpart for storage vessels at existing sources, and in Table 6 of this subpart for storage vessels at new sources.
 - (2) *Group 2 storage vessel* means a storage vessel that does not meet the definition of a Group 1 storage vessel.

Since Reilly Industries Inc. is considered an existing source under the HON the criteria in Table 5 was used to determine Tank 641 status. The criteria in Table 5 of subpart G is provided below:

Vessel capacity (cubic meters)	Vapor Pressure ¹ (kilopascals)
75# capacity < 151	\$ 13.1
151# capacity	\$ 5.2

¹ Maximum true vapor pressure of total organic HAP at storage temperature.

Storage Tank 641 has a storage capacity greater than 151 cubic meters and maximum true vapor pressure of total organic HAP at storage temperature below 5.2 kilopascals. The actual HAP maximum true vapor pressure for organic HAPs was classified as confidential information and is not included in this document. Based on the storage capacity and the maximum true vapor pressure of organic HAP, storage Tank 641 was classified as a Group 2 storage vessel.

Group 2 storage vessels are subject to the requirements of 63.119 (a)(3) as follows:

"For each Group 2 storage vessel that is not part of an emissions average as described in 63.150 of this subpart, the owner or operator shall comply with the recordkeeping requirements in 63.123(a) of this subpart and is not required with any other provisions in 63.119 through 63.123 of this subpart."

Since this tank is not part of an emissions average as defined in 63.150, Tank 641 is only subject to the recordkeeping requirements in 63.123(a). Pursuant to 63.123(a) Reilly Industries is required to keep the records showing the dimensions of the storage tank and an analysis showing the capacity of the storage vessel as long as the tank holds the Group 1 or Group 2 status.

- (b) Pursuant to 40 CFR Part 63.110(b)(1) (Subpart G) Group 1 and Group 2 storage vessels that are also subject to the provisions of 40 CFR Part 60 Subpart Kb are only required to comply with the requirements of Subpart G. Consequently Subpart Kb is applicable to this Tank but its requirements are overridden by Subpart G.

State Rule Applicability - Individual Facilities

Petroleum Liquid Storage Facilities (326 IAC 8-4-3)

The requirements of 326 IAC 8-4-3 are not applicable to this storage vessel since this vessel is not used to store petroleum liquids or liquids derived from petroleum.

Volatile Organic Liquid Storage Vessels (326 IAC 8-9)

The requirements of 326 IAC 8-9 are not applicable since this tank is not located in Clark, Floyd, Lake or Porter Counties.

Compliance Requirements

No compliance monitoring is required, since there are no applicable emissions limitations or design criteria applicable to this tank.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. T097-11345-00315.